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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

**RACHEL HUNTER; REBECCA
HUNTER; and BONNIE
HUNTER, Individually and On
Behalf of All Others Similarly
Situated,**

PLAINTIFFS,

V.

**PIONEER CREDIT
RECOVERY, INC.,**

DEFENDANT.

Case No: 13-cv-02090-JAK-DTB

**JOINT STIPULATION TO DISMISS
ACTION WITH PREJUDICE AS TO
PLAINTIFFS' INDIVIDUAL CLAIMS
AND WITHOUT PREJUDICE AS TO
THE PUTATIVE CLASS CLAIMS**

Judge: Hon. John A. Kronstadt

1 Plaintiffs RACHEL HUNTER, REBECCA HUNTER AND BONNIE HUNTER
 2 (hereinafter "Plaintiffs") and Defendant PIONEER CREDIT RECOVERY, INC.
 3 (hereinafter "Defendant"), (all jointly hereinafter referred to as "the Parties"),
 4 hereby move to dismiss the above entitled action with prejudice as to Plaintiffs'
 5 individual claims and without prejudice as to the putative class members' claims.

6 The Parties agree that this Court may proceed to dismiss this action entirely
 7 with prejudice as to Plaintiffs' individual claims and without prejudice as to the
 8 putative class members' claims. This Court retains jurisdiction to enforce the
 9 settlement of this action.

10 Dated: June 4, 2014

KAZEROUNI LAW GROUP, APC

11 By: /s/ Abbas Kazerounian
 12 Abbas Kazerounian
 13 Attorney for Plaintiffs

14 Dated: June 4, 2014

15 STROOCK & STROOCK & LAVAN LLP
 16 LISA M. SIMONETTI
 17 ARJUN P. RAO
 18 JULIETA STEPANYAN

19 By: /s/ Arjun P. Rao
 20 Arjun P. Rao

21 Attorneys for Defendant
 22 PIONEER CREDIT RECOVERY,
 23 INC.

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Arjun P. Rao, counsel for Defendant, and that I have obtained Mr. Rao's authorization to affix his electronic signature to this document.

Dated: June 4, 2014

KAZEROUNI LAW GROUP, APC

By: /s/ Abbas Kazerounian
Abbas Kazerounian
Attorney for Plaintiffs

Kazerouni Law Group, APC
Costa Mesa, California